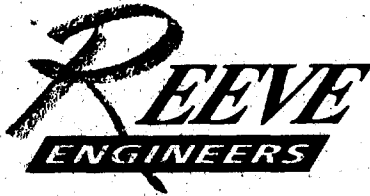


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Sound Advice In Telecommunications

February 5, 1993

Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

In the Matter of: RM-8159

Petition to Authorize Co-Primary Sharing
of the 450 MHz Air-Ground Radiotelephone
Service with BETRS

Reeve Engineers respectfully submits its comments in support of the joint petition for rulemaking (RM-8159). Reeve Engineers provides radio engineering services for six rural local exchange carriers in Alaska. These carriers provide access lines in approximately 100 different communities with populations ranging from 25 to 3,500.

Since authorized by the Commission in 1988, Basic Exchange Telecommunications Radio Service (BETRS) has proven to be a very cost-effective method for providing local exchange service in rural areas of Alaska where it was not economically possible to provide service by any other method. A number of companies make reliable BETRS equipment in the 450 MHz band, and this band provides good service quality.

However, there are only 26 frequency pairs available in the 450 MHz BETRS band. This shortage of frequencies has done two things: First, it has limited the expandability of local exchange service in many areas where there a large number of people that chose a truly rural lifestyle but still want high quality telephone service. Such areas include the northwest, southwest and southeast parts of Alaska and interior Alaska, where construction of wireline facilities is economically impossible, yet where a large number of people live or work outside of the communities. I am aware of specific systems in interior Alaska and southeast Alaska that will not be able to expand as the demand for BETRS grows. The demand for BETRS is growing very rapidly in Alaska, but I estimate we are at least 5 years away from reaching the peak of that growth.

Second, the shortage of frequencies has greatly increased the cost of licensing BETRS systems because of the need for expensive interference studies of co-channel facilities. I should point out that our experience tells us that interference is not realistically possible more often than not because of the rugged terrain and resulting defraction paths that

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exist as a rule in most of Alaska. However, we still are obligated to perform the interference studies at great expense to our client local exchange carriers and, ultimately, their subscribers. I can cite specific instances where this has occurred in Prince William Sound in southcentral Alaska and Prince of Whales Island in southeastern Alaska. Having more frequencies available would reduce the chances of having to make an interference study on a given system because we could more easily choose frequencies for which co-channel facilities are beyond the distances prescribed in 47 CFR Part 22.

The joint petition seeks to make available additional spectrum contiguous to the existing 450 MHz band on a co-primary basis. Local exchange carriers and their subscribers will benefit from expansion of the available channels for BETRS in the 450 MHz band with no interference to any remaining users of the spectrum. The air-ground radiotelephone service referenced above essentially does not exist in Alaska. Providing access to these channels will strongly promote the public interest in universal, cost-effective telecommunication service. Reeve Engineers, on behalf of its clients, strongly supports the joint petition and asks the Commission to commence a rulemaking promptly and to grant the petition.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "W D Reeve", followed by a long horizontal line extending to the right.

Whitham D. Reeve, P.E.
President